

UNITED STATES DISTRICT COURT OF MASSACHUSETTS
FILE# 04-CV- 11959-NG.

FILED
IN CLERK'S OFFICE

2006 MAY 19 P 2:15

ATTENTION : COOLEY MANION JONES

FLAVIA BENITEZ
PLAINTIFF

PRO- SE

U.S. DISTRICT COURT
DISTRICT OF MASS.

VS

SODEXHO- MARRIOTT
DEFENDANTS

COOLEY MANION JONES

IN RESPOND TO COOLEY MANION JONES LETTER ON MAY 8, 2006
REMINDING A DEPOSITION SCHEDULE BY YOU (WITHOUT MY
APPROVAL) FOR MAY 23, 2006 @ 10:00 AT COOLEY MANION JONES
OFFICE 21 CUSTOM HOUSE ST. BOSTON .

UNFORTUNATELY , I NOT ABLE TO COMPLY WITH THE DEPOSITION
FOR THE FOLLOWING REASONS:

- 1- FLAVIA BENITEZ APPEALED IN COURT AT THE CONFERENCE
ON MARCH 27, 2006 AND IN WRITING A PPEAL SUBMITTED AT THE
OFFICE 'S CLERK. ON THE SAME DAY MARCH 27, 2006.
- 2- FLAVIA BENITEZ IS NOT ABLE TO TAKE ANY DEPOSITION WITH-
OUT THE PRESENCE OF AN ATTORNEY MY U. S . A CONSTITUTIONAL
RIGHTS WILL BE COMPROMISED.
- 3- FAILURE TO SEND ME THE ISSUES QUESTIONS RELATE TO THE
DEPOSITION.
- 4- MASS CIVIL RULE 45 (F) AND LIABILITY FOR TORT DAMAGES
M G L A C 233 4
- 5- MASS CIVIL RULE 30 d (1) THE PHYSICAL CONDITION IS AN
ISSUE, SCHEDULE AND DURATION OF DEPOSITION.

6- FLAVIA BENITEZ OR HER COUNSEL AND THE DEFENDANTS'S
COUNSELS WILL WORK TOGETHER AND AGREE WHEN ,
WHERE ,HOW LONG AND ISSUES OF THE DEPOSITION FOR
ALL PARTIES.

MAY 18, 2006

RESPECTFULLY SUBMITTED

Flavia Benitez
FLAVIA BENITEZ

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